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United States Department of the Interior

OFFICE OF THE SECRETARY WASHINGTON, D.C. 20240

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OCT 10 1985

Gene Lucero, Director Office of Waste Programs Enforcement Environmental Protection Agency Washington, D.C. 20460

Dear Mr. Lucero:

In response to your request we have conducted a preliminary natural resources study of the New Bedford Site, Bristol County, Massachusetts. The following are our findings.

New Bedford Harbor is grossly contaminated with PCBs and metals as the result of discharges by two electrical capacitor manufacturers. The upper harbor (above the hurricane barrier) is the most heavily contaminated, while the lower harbor, to Buzzard's Bay is somewhat less contaminated.

Fish and Wildlife Service employees have visited the site on several occasions, during winter and late spring. The harbor contained significant trustee resources during both visits. Hundreds of scaup and goldeneyes use the harbor in winter, feeding on contaminated fin and shellfish. Lesser numbers of puddle ducks feed in the Harbor. Spring use is by nesting puddle and diving ducks, gulls, terns, passerines, and raptors. The upper harbor is shallow, with major wetlands adjacent to mudflats and open water. This juxtaposition of habitat with highly contaminated materials makes it likely that migratory birds have been and are accumulating PCBs and/or metals.

Levels of PCB contamination in the outer harbor and Buzzard's Bay are less in sediments, although apparently as high in fish flesh as the inner harbor. Exposure of migratory birds to PCBs in Buzzard's Bay is likely significant through the food web.

Presently there are on-going studies of the wetlands in the upper harbor. The intent is to determine the state of health of the wetlands and adjacent flats. The results of the studies and others will enable us to better determine if trustee resources have been significantly affected. Since the currently available information is inadequate and ongoing studies may fill the gap, we can not at this time agree to a release of liability for possible damages until the extent of impact can be reasonably assessed.

Sincerely,

Bruce Blanchard, Director, Environmental Project Review